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CLIFFORD CHANCE US LLP

31 WEST 52ND STREET
NEW YORK, NY 10019-6131

TEL +1 212 878 8000
FAX +1 212 878 8375

www.cliffordchance.com

By ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Direct Dial: +1 212 878 8205
E-mail: jeff.butler@cliffordchance.com

September 30, 2024

Re: *Kingdom of Belgium, Federal Public Service Finance Pension Plan Litigation*,
Lead Case: No. 21 Civ. 6392 (JGK)
Member Cases: Nos. 21 Civ. 6392 (JGK), 21 Civ. 6399 (JGK), 21 Civ. 6402 (JGK),
21 Civ. 6404 (JGK), 21 Civ. 6405 (JGK), 21 Civ. 6407 (JGK),
21 Civ. 6408 (JGK)

Dear Judge Koeltl:

We write pursuant to Section 1.E of Your Honor's Individual Practices, and with the consent of all of the parties, to request extensions of certain deadlines set forth in the Rule 26(f) Report approved by the Court on August 7, 2023 (the "August 7, 2023 Order") and as extended by the Court on January 4, 2024, April 12, 2024, July 12, 2024 and August 7, 2024 (the "August 7, 2024 Order").

In the August 7, 2023 Order, the Court approved an initial expedited discovery schedule relating to the statute of limitations defense, to be followed by briefing on a limited consolidated summary judgment motion. The August 7, 2023 Order also set various other pretrial deadlines, and the operative schedule is now set out in the August 7, 2024 Order. Under the current schedule, Plaintiff's opposition to Defendants' summary judgment motion is due on October 4, 2024. Scheduling issues involving witnesses in Belgium have made it unexpectedly difficult for Plaintiff's counsel to meet this deadline. For this reason, Plaintiff requests an extension of time to submit its opposition papers until October 18, 2024.

In addition, under the current schedule, general document production by the parties is due to be completed on October 4, 2024. We have been informed that several Defendants expect to retain new counsel. In order to preserve the structure of the discovery schedule intended by the August 7, 2023 Order, and to provide new defense counsel with a reasonable opportunity to participate in discovery, the parties request a 90-day extension of time to complete document production, with a corresponding extension of other pretrial dates.

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Based on the foregoing, the parties have now agreed to the following revised schedule, which extends by two weeks the deadline for Plaintiff's opposition to Defendants' summary judgment motion and Defendants' reply, and all other remaining deadlines in the August 7, 2024 Order by approximately 90 days:

Description	Proposed Deadline
Limited Consolidated Summary Judgment Motion on Statute of Limitations Issues	August 30, 2024
Opposition to Summary Judgment Motion on Statute of Limitations Issues	October 18, 2024
Reply on Statute of Limitations Issues	November 8, 2024
Completion of General Document Production (by Parties)	January 10, 2025
Contention Interrogatories pursuant to Local Civil Rule 33.3 may be served	February 7, 2024
Meet-and-confer on Topics for Expert Discovery	February 14, 2025
Fact Discovery Cut-Off	June 20, 2025
Expert Reports by Party with Burden	August 19, 2025
Rebuttal Expert Reports	September 19, 2025
Expert Discovery Cut-Off	November 7, 2025
Dispositive Motions	December 12, 2025
Pretrial Order	45 days from date of decision on any dispositive motion (or January 17, 2026, if there is no such motion)

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The parties jointly request that the Court approve these modifications to the schedule. This is the fifth request for extensions of the deadlines in the August 7, 2023 Order.

Respectfully submitted,

s/ Jeff E. Butler

Jeff E. Butler